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BEFORE THE POSTAL RATE COMMISSION WASHINGTON, D.C. 20268-0001

4 50 PM '00 POSTAL RATE COMMISSION OFFICE OF THE SECRETARY

POSTAL RATE AND FEE CHANGES, 2000

Docket No. R2000-1

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS VAN-TY-SMITH TO INTERROGATORY OF UNITED PARCEL SERVICE (UPS/USPS-T17-2)

The United States Postal Service hereby provides the response of witness Van-Ty-Smith to the following interrogatory of United Parcel Service: UPS/USPS-T17-2, filed on March 7, 2000.

The interrogatory is stated verbatim and is followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr. Chief Counsel, Ratemaking

Susan M. Duchek

475 L'Enfant Plaza West, S.W. Washington, D.C. 20260-1137 (202) 268-2990 Fax -5402 March 21, 2000

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS VAN-TY-SMITH TO UPS INTERROGATORIES

UPS/USPS-T17-2. Provide SAS log files and JCL codes for every program described in USPS-LR-I-106. Where applicable, provide the output data or files produced by each program.

RESPONSE TO UPS/USPS-T17-2.

As is indicated in the "source code" section at the end of each description of the SAS programs in USPS-LR-I-106, the JCL, program listings, and SAS log files for all SAS programs described in USPS-LR-I-106, are contained in the diskettes filed in USPS-LR-I-106. Except for the tables identified as "spreadsheets" in Part V, and all the tables in Part VIII, the SAS output data consist of the tables shown in USPS-LR-I-106 (many SAS tables have been reformatted to Excel). The SAS output tables are generated in four different data processing streams, each one of which starts with the IOCS tally file. Also, see my response to TW-USPS-T17-2 b and c.

DECLARATION

I, Eliane Van-Ty-Smith, declare under penalty of perjury that the foregoing answers are true and correct, to the best of my knowledge, information, and belief.

Dated: 3/21/00

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon all participants of record in this proceeding in accordance with section 12 of the Rules of Practice.

Susan M. Duchek

475 L'Enfant Plaza West, S.W. Washington, D.C. 20260–1137 (202) 268–2990 Fax –5402 March 21, 2000